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SOUTHERN DISTRICT OF CALIFORNIA
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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8001

UNITED STATES OF AMERICA Plaintiff, v. Daniel FIGUEROA-Moreno (1) Ricardo FIGUEROA-Moreno (2) Maria Eufelia CORONA-Cordova (3) Defendants.	Magistrate Case No.: COMPLAINT FOR VIOLATION OF 21 U.S.C. § 841(a)(1) Possession with Intent to Distribute (Felony) 18 U.S.C. § 2 - Aiding & Abetting

The undersigned complainant being duly sworn states:

That on or about January 2, 2008, within the Southern District of California, defendants Daniel FIGUEROA-Moreno, Ricardo FIGUEROA-Moreno and Maria Eufelia CORONA-Cordova, did knowingly and intentionally possess, with intent to distribute approximately 1,738.68 kilograms (3,833.79 pounds) of marijuana, Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Cynthia M. Barajas, Task Force Officer
Drug Enforcement Administration

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 3RD DAY OF JANUARY 2008.

PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

UNITED STATES OF AMERICA
v.
Daniel FIGUEROA-Moreno (1)
Ricardo FIGUEROA-Moreno (2)
Maria Eufelia CORONA-Cordova (3)

STATEMENT OF FACTS

I, Special Agent Barbara Hopkins, of the Drug Enforcement Administration, declare under penalty of perjury, the following is true and correct:

On January 2, 2008, SA Hopkins received information from an individual who stated had observed a large amount of taped bundles at a residence located at 1711 Lenrey Avenue, El Centro, California.

Drug Enforcement Administration (DEA) agents along with the Imperial County Sheriff's Office and El Centro Police Department received consent from Daniel FIGUEROA-Moreno via telephone to search the residence. Upon searching the residence, one hundred seventy-four (174) bundles were discovered in three rooms of the residence. The bundles contained a green leafy substance which field tested positive for marijuana. The total weight of the bundles was 1,738.68 kilograms (3,833.79 pounds) of marijuana.

The two occupants of the residence, Ricardo FIGUEROA-Moreno and Maria CORONA-Cordova, were immediately detained upon the discovery of the marijuana. Daniel FIGUEROA-Moreno was located shortly thereafter on a traffic stop after being observed by agents driving slowly past the residence.

DEA Special Agent (SA) Adriel Villacorta read CORONA her rights per a DEA 13 card. CORONA acknowledged her rights and agreed to answer questions without an attorney present. CORONA denied knowledge of the presence of marijuana at the residence and stated she had only been at the residence since Sunday, December 30, 2007. However, during the consent search of the room where CORONA stated she had personal property, a pair of women's underwear was located underneath one of the bundles in the closet. Furthermore, the closet door was partially ajar clearly showing the numerous bundles. CORONA also told agents that she and R. FIGUEROA were instructed that two individuals would be arriving and when they did, CORONA and R. FIGUEROA were to let them inside.

DEA SA Villacorta read R. FIGUEROA his Warnings via a DEA 13 card. R. FIGUEROA acknowledged his rights and agreed to answer questions without an attorney being present. R. FIGUEROA denied knowledge of marijuana at the residence and stated that his brother, Daniel FIGUEROA-Moreno, only told him (R. FIGUEROA) he (D. FIGUEROA) was doing something bad. As stated above, R. FIGUEROA and CORONA informed agents that he and CORONA were advised that two individuals would be arriving at the residence and when they did to let the individuals inside. Additionally, agents located a set of keys which opened the front door of the residence in the pants pocket of R. FIGUEROA.

DEA SA Jeff Butler read Daniel FIGUEROA-Moreno Miranda Warnings via a DEA 13 card. D. FIGUEROA acknowledged his rights and agreed to answer questions without an attorney being present. D. FIGUEROA informed agents he was paid $200.00 every two weeks to live at the residence at 1711 Lenrey Ave, El Centro, and take care of the house. D. FIGUEROA acknowledged marijuana being present in the bedrooms and bedroom closets. D. FIGUEROA stated he informed both M. CORONA and R. FIGUEROA he kept marijuana at the residence and they could remain at the residence while they located jobs.